

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

<p>KATE WEISSMAN,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>UNITED HEALTHCARE INSURANCE COMPANY, UNITED HEALTHCARE SERVICE, LLC, AND INTERPUBLIC GROUP OF COMPANIES, INC. CHOICE PLUS PLAN,</p> <p style="text-align: center;">Defendants.</p>	<p><b>CIVIL ACTION NO. 1:19-cv-10580</b></p> <p><b>Consolidated with      1:19-cv-12224; and</b> <b>Consolidated with      1:19-cv-12239</b></p> <p><b><u>CLASS ACTION</u></b></p>
<p>RICHARD COLE,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>UNITED HEALTHCARE INSURANCE COMPANY,</p> <p style="text-align: center;">Defendants.</p>	<p>CIVIL ACTION NO. 1:19-cv-12224</p>
<p>ZACHARY RIZZUTO,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>UNITED HEALTHCARE INSURANCE COMPANY, UNITED HEALTHCARE SERVICE, INC., and THE HERTZ CUSTOM BENEFIT PROGRAM,</p> <p style="text-align: center;">Defendants.</p>	<p>CIVIL ACTION NO. 1:19-cv-12239</p>

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Plaintiffs Kate Weissman, Richard Cole, and Zachary Rizzuto, (collectively, "Plaintiffs")  
on behalf of themselves and all similarly situated individuals, file this unopposed Motion for

Preliminary Approval of Class Action Settlement seeking preliminary approval of a class action settlement reached in this matter on behalf of classes of certain individuals with a health insurance plan or policy issued and/or administered by Defendant United Healthcare Insurance Company or United Healthcare Service, Inc. (“Defendants,” and collectively with Plaintiffs, the “Parties”).

Plaintiffs respectfully request that the Court enter the Proposed Order Granting Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement and Agreement (attached to Settlement Agreement at Exhibit B), certify the Class requested for purposes of settlement, appoint Plaintiffs’ counsel as Class Counsel, appoint Rust Consulting, Inc. as Settlement Administrator, order that Notice be issued to the Class per the terms of the Settlement, and set a final Fairness Hearing date at least 130 days after entry of a preliminary approval order.

**Conferral Under Local Rule 7.1(a)(2).**

Plaintiffs have conferred with the Defendants, and while disputing Plaintiffs’ claims in this litigation, Defendants do not oppose the relief sought in this motion.

Dated: May 9, 2025.

Plaintiffs and the Proposed Settlement Class  
By Their Attorneys,

/s/ Robert J. Neary

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